



CALIFORNIA URBAN WATER AGENCIES

December 4, 1996

Mr. Rick Woodard
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

CUWA's Comments on the CALFED Acceptable Ranges and Analysis Plan

Dear Rick:

The California Urban Water Agencies (CUWA) appreciates the opportunity to provide comments to CALFED on the Acceptable Ranges for Parameters of Concern and the Plan for Analysis of Proposed Water Quality Actions.

Acceptable Ranges for Parameters of Concern

CUWA submitted a letter to Lester Snow on May 17, 1996 containing our detailed recommendations on drinking water parameters of concern. The following discussion summarizes the more detailed information presented previously and contains additional recommendations for turbidity and pathogens, as requested by John Gaston. CUWA recommends that CALFED not use the term "acceptable ranges" and suggests that "desirable targets" more adequately describes the values presented for each parameter of concern. CUWA also believes that all values in the table should be expressed as less than or equal to the subject number (except pH and DO). Our specific comments on several parameters of concern are:

- Chloride - CUWA recommends that CALFED adopt a desirable target for chloride of a 10 year average of 55 mg/L and a monthly average of 110 mg/L. This will comply with the State Water Project (SWP) contract objective.
- Pathogens - To balance disinfection requirements for controlling pathogens with the production of disinfection by-products, sources of pathogens should be located away from drinking water intakes. Desirable targets of less than 1 oocyst/100L for *Giardia* and *Cryptosporidium* in raw water supplies should be used by CALFED in evaluating actions.
- Total Dissolved Solids - CUWA recommends that CALFED adopt a desirable target for TDS of a 10 year average of 220 mg/L and a monthly average of 440 mg/L. This will facilitate local wastewater reclamation and conjunctive use projects and comply with the SWP contract objective.

- Turbidity - CUWA recommends 50 NTU as a desirable target for turbidity to improve treatment reliability. Use of the maximum contaminant level of 0.5 or 1.0 NTU is not appropriate for raw water supplies.

Plan for Analysis of Proposed Water Quality Actions

CUWA agencies reviewed the analysis plan and offer the following suggestions:

- Mine Drainage Remediation - CUWA recommends that the action statement be rewritten as follows:

"Reduce tributary and Delta heavy metals loadings by implementation of moderate onsite mine drainage remediation/control measures using relevant on-going and pending control programs as guides. Fund remediation through pollution-credit trading; e.g., reduce loading from mines in lieu of more costly, but less effective, wastewater treatment plant upgrades or other means."

We are assuming that one work product will be a list of mine sites that have been identified and ranked by level of importance and parameter(s) of concern.

- Undertake Toxicity Bioassay and Identification Testing - CUWA recommends that the action statement be rewritten as follows:

"Reduce pollutants adversely impacting aquatic resources by using toxicity test measurements to target point and non-point source control efforts."

We suggest that item 4 in the study steps be rewritten as follows:

"Conduct toxicity identification/reduction evaluations (TI/REs) at those locations at which unacceptable toxicity is measured. Develop appropriate control programs based on TI/RE results."

CUWA appreciates the opportunity to comment on these CALFED work products and we look forward to receiving the more detailed descriptions of the Actions prior to the next Water Quality meeting. We understand the need to provide more information on each of the Actions but we urge you to forge ahead with more detailed analysis of the high priority Actions. Please call me if you have any questions on our comments.

Sincerely,

Elaine M. Archibald
for Byron M. Buck
Executive Director